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**VIA ECF**

Hon. Katherine Polk Failla, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, New York 10007

**MEMO ENDORSED**

USDC SDNY  
DOCUMENT  
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DATE FILED: August 13, 2018

**Re: Sharon Wells v. The Achievement Network, et al.  
Docket No.: 18-CV-6588(KPF)(OTW)**

Dear Judge Failla:

This firm represents Defendants The Achievement Network, Teimosa Martin, Melinda Spooner and Kimberly Cockrell (“Defendants”) in connection with the above-referenced matter. We write pursuant to Rule 2(E) of Your Honor’s Individual Rules of Practice in Civil Cases to request an extension of time to respond to the Complaint filed by Plaintiff Sharon Wells (“Plaintiff”) through and including September 21, 2018. Defendants are willing to accept service in exchange for an extension of time to respond to Plaintiff’s Complaint.

The deadline for Defendants to respond to the Complaint has not passed since Defendants have not been served. This is Defendants’ first request for an extension of time to respond. Defendants submit the instant request in exchange for their willingness to accept service. Plaintiff consents to Defendants’ request. This request will not affect any other scheduled dates.

Thank you for your consideration of this matter. Please do not hesitate to contact us should you require any further information.

Respectfully submitted,

JACKSON LEWIS P.C.

Wendy J. Mellk

cc: Damon McDougal, Esq. (via ECF)  
Tania J. Mistretta, Esq. (JL – via ECF)

Application GRANTED. No further extensions will be granted.

Dated: August 13, 2018  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE